

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DEXLON CHARLES,  
*on behalf of himself, FLSA Collective Plaintiffs  
and the Class,*

Plaintiff,

v.

Case No.: 1:22-cv-04232

PINNACLE TOO, LLC,  
d/b/a PINNACLE ELECTRIC,  
AGIR ELECTRICAL, LTD.,  
d/b/a PINNACLE ELECTRIC,  
FRANKCRUM 6, INC.,  
d/b/a FRANKCRUM,  
FRANK CRUM JR., and  
ANTONY GIRONTA

Defendants.

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

**PLEASE TAKE NOTICE**, that Rivkin Radler LLP (“Rivkin Radler”), will move pursuant to Local Rule 1.4 before the Honorable Jesse M. Furman, District Court Judge for the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an order (1) permitting Rivkin Radler to withdraw as counsel for Defendants Pinnacle Too, LLC, Agir Electrical Ltd., FrankCrum 6, Inc., Frank Crum Jr., and Antony Girona (collectively “Defendants”) (2) staying this case for thirty (30) days following the entry of such order relieving Rivkin Radler as counsel in order to permit Defendants to retain new counsel; and (3) granting such other and further relief as the Court deems just and proper.

DATED: Uniondale, New York  
January 9, 2023

Yours, etc.  
RIVKIN RADLER LLP  
*Attorneys for Defendants*

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All Counsel of Record

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